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*Attorney for Defendant/Counterclaimant US TURF, LLC*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

UPMANN SANCHEZ TURF AND  
 LANDSCAPE, INC., dba US Turf,

Plaintiff,

v.

US TURF, LLC, dba Serenity  
 Landscaping,

Defendant.

US TURF, LLC,

Counterclaimant,

v.

UPMANN SANCHEZ TURF AND  
 LANDSCAPE, INC.,

Counter-Defendant.

**Case No. 2:21-cv-01749-JCM-DJA**

**STIPULATION AND  
 ORDER FOR EXTENSION OF TIME TO  
 RESPOND TO PLAINTIFF UPMANN  
 SANCHEZ TURF AND LANDSCAPE'S  
 MOTION TO DISMISS AND STRIKE  
 DEFENDANT'S COUNTERCLAIMS  
 PURSUANT TO FEDERAL RULES OF  
 CIVIL PROCEDURE, RULES 12(b)(6)  
 AND 12(f) (ECF NO. 15)**

(First Request)

Pursuant to Local Rules IA 6-1 and IA 6-2, Plaintiff/Counter-Defendant UPMANN SANCHEZ TURF AND LANDSCAPE, INC. ("Plaintiff") and Defendant/Counterclaimant US TURF LLC ("Defendant") hereby stipulate and agree to an extension of time for Defendant to file its response to Plaintiff's Motion to Dismiss and Strike Defendant's Counterclaims Pursuant to FRCP 12(b)(6) and 12(f) (ECF No. 15) (the "Motion to Dismiss") from the current deadline of December 21, 2021, to January 7, 2022. This is the first request by the parties for such an extension.

Counsel for the parties already met and conferred on December 8, 2021, in accordance with FRCP 26(f) and have already submitted to the Court a proposed discovery plan and scheduling

order (ECF No. 16). Defendant's request for additional time to respond to the Motion to Dismiss is to accommodate Defendant's counsel's preexisting foreign vacation plans from December 12<sup>th</sup> through December 19<sup>th</sup> along with the expected normal disruptions of the holiday season. Accordingly, such extension is for good cause and not for purposes of delay.

THEREFORE, Plaintiff and Defendant hereby stipulate and agree that Defendant's deadline to file its response to Plaintiff's Motion to Dismiss and Strike Defendant's Counterclaims Pursuant to FRCP 12(b)(6) and 12(f) (ECF No. 15) shall be extended to January 7, 2022.

DATED: December 10, 2021

**IT IS SO AGREED AND STIPULATED:**

**PROCOPIO, CORY, HARGREAVES & SAVITCH LLP**

/s/Lisel Ferguson

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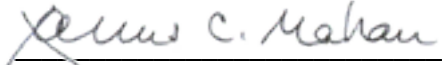
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/s/ Ryan Gile

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*Attorney for  
Defendant/Counterclaimant US TURF LLC*

**IT IS SO ORDERED:**

  
UNITED STATES DISTRICT JUDGE

Dated: December 13, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that on December 10, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document is being served via transmission of Notices of Electronic Filing generated by CM/ECF to all participants in the case who are registered CM/ECF users.

/s/ Ryan Gile

Employee, Gile Law Group Ltd.